

FILED
UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

OCT - 6 2005

MATTHEW J. DYKMAN
CLERK

IN THE DISTRICT COURT OF THE UNITED STATES

FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

EDWARD J. VELARDE, Jr.,

Defendant.

CRIMINAL NO. 05-2062 MV

18 U.S.C. § 641: Theft of
Public Money.

INFORMATION

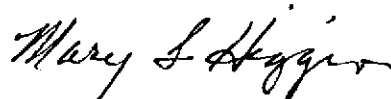
The United States Attorney charges:

On or about April 24, 2001, and continuing to on or about May 3, 2001, in Rio Arriba County, State and District of New Mexico, the defendant, **Edward J. Velarde, Jr.**, wilfully and knowingly did embezzle, steal and convert to his own use funds belonging to the United States Department of Energy, in that the defendant, on behalf of the Velarde Valley Apple Grower's Cooperative ("VVAGC"), sought and received Department of Energy funds from the Regional Development Corporation ("RDC"), a non-profit New Mexico corporation which administered Department of Energy funds to various grantees in northern New Mexico, in the form of check No. 2129, payable to Mountain States Insulators, Inc., in the amount of \$20,000.00, drawn on RDC's bank account, which the defendant deposited into a Rancho de Santa Fe Bank account controlled by him, knowing that he did not have permission or authorization from Mountain States Insulators, Inc., or

the Regional Development Corporation to deposit the check into his bank account and to convert the funds to his own use.

In violation of 18 U.S.C. § 641.

DAVID C. IGLESIAS
United States Attorney

A handwritten signature in cursive script, reading "Mary L. Higgins".

MARY L. HIGGINS
Assistant United States Attorney